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COMMISSION

2013 JUL -2 PM 3: 02



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

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**SENSITIVE**

2013 JUL -2 PM 3: 31

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COMMISSION  
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**MEMORANDUM**

**TO:** The Commission

**FROM:** Anthony Herman  
General Counsel

Daniel A. Petalas  
Associate General Counsel for Enforcement

**BY:** Peter G. Blumberg  
Assistant General Counsel

*PGB*

William A. Powers  
Assistant General Counsel

Marianne Abely  
Attorney

Emily Meyers  
Attorney

**SUBJECT:** MUR 6112 and AF 2638  
John McCain 2008, Inc. and McCain-Palin Compliance Fund, Inc.

**RE:** Pre-Probable Cause Conciliation Agreement

**I. INTRODUCTION**

Attached is a conciliation agreement signed by counsel for John McCain 2008, Inc. ("McCain 2008") and McCain-Palin Compliance Fund, Inc. ("GELAC") (collectively, "Committees"). This agreement, which we recommend the Commission accept, would settle violations of 2 U.S.C. §§ 434(a), 434(b) and 441a(f).

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**MUR 6112**  
**John McCain 2008, Inc.**  
**McCain-Palin, Compliance Fund Inc.**  
**Memorandum to the Commission**  
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**RECOMMENDATIONS**

1. Accept the attached signed conciliation agreement with John McCain 2008, Inc. and Joseph Schmuckler in his official capacity as treasurer and McCain-Palin Compliance Fund, Inc. and Joseph Schmuckler in his official capacity as treasurer
2. Approve the appropriate letters.
3. Close the file.